

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re: Lois Joyce Evans,	:	Bankruptcy Case No.: 20-20387-CMB
	:	
Debtor.	:	Chapter 11
	:	
_____	:	
Lois Joyce Evans,	:	
	:	Document No.:
Movant,	:	
	:	Related to Document No.: 182
v.	:	
	:	
No Respondents,	:	
	:	
Respondent.	:	

STATUS REPORT

AND NOW comes the Debtor, Lois Joyce Evans (“Debtor”), by and through her Counsel, Brian C. Thompson, Esquire and Thompson Law Group, P.C., and files the following Status Report, and avers as follows:

1. Counsel for the Debtor reports that after the hearing on September 1, 2021 counsel for the debtor and counsel for IRS conferred repeatedly and exchanged significant amounts of information regarding the non-dischargeable portion of the proof of claim filed by IRS in this case.
2. IRS was able to provide information that clarified the basis for the majority of the claims and how certain payments were credited.
3. Said information addressed most of Debtor’s concerns, especially those regarding significant payments in 2013.
4. The only remaining issue is the specific balance of the non-dischargeable debt asserted by IRS.
5. Debtor acknowledges that any existing debt related to the 2002 through 2007 tax liabilities and interest would be non-dischargeable.

6. The debtor is seeking to provide proof of certain payments made on the 2002 through 2007 taxes which would dramatically reduce the amount of non-dischargeable debt.

7. To that end, Debtor recognizes that the burden of proof regarding said payments falls upon her, and she further realizes that said endeavor, while important, is ancillary to goals of the proposed plan of reorganization in this case.

8. Counsel for IRS has provided a stipulation to address payment of the, secured, priority, and dischargeable unsecured debt, and the debtor is substantially in agreement with those terms.

9. Counsel for the debtor is circulating proposed language to be added to the stipulation that would preserve the ability of the parties to separately address the amount of non-dischargeable debt so that the case can proceed to confirmation.

10. If an agreement on the additional language is reached, a stipulation will be filed prior to the scheduled hearing on plan confirmation.

Respectfully Submitted,

Date: October 11, 2021

THOMPSON LAW GROUP, P.C.

By: /s/ Brian C. Thompson
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